

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

NO. 11,195

BERNARD HEDGECOCK,
Appellant,

vs.

JUNE RAUS,
Appellee.

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF AND
JOINT APPENDIX

Come now the appellant, by and through his counsel of record,
Robert J. Stanford and Ernest C. Raskauskas, and respectfully moves the
Court to enlarge the time for the filing of appellant's brief and joint
appendix from March 8, 1967, to and including March 18, 1967, and for
reasons in support of said motion states as follows:

1. Complicated questions of law are involved in this appeal, and the
prior conflicting commitments of the two counsel for appellant have prevented
sufficient joint effort by them in the full prosecution of the appeal.

2. The joint appendix to be filed herein shall be a considerable length,
and the preparation and printing thereof shall take a week. In addition, with
the allowance of an additional ten days in which to file the same, counsel for
the appellant are of the opinion that portions of said joint appendix might be
omitted by stipulation of counsel on both sides.

3. The Notice of Appeal and the record on appeal have been timely
filed.

ERNEST C. RASKAUSKAS
ATTORNEY AT LAW
SUITE 707
1625 K STREET, N.W.
WASHINGTON, D. C. 20005

225-2735

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4. The appellee through counsel, Paul A. Connelly, has consented to the requested extension of time.

Ernest C. Haskauskas

Robert J. Standford

Attorneys for Appellants

I CONSENT:

Counsel for Appellee

STATEMENT OF SERVICE

I hereby certify that a copy of the foregoing Motion was by me mailed,

Postage prepaid, to

Ernest C. Haskauskas

UNITED STATES COURT OF APPEALS
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BERIK HEINE,

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v.

JURI RAUS,

Appellee.

APPELLEE'S COUNTER-DESIGNATION
OF PARTS OF RECORD TO BE
INCLUDED IN JOINT APPENDIX

In addition to those matters designated by the appellant for inclusion in an appendix, the appellee designates the following:

1. Stipulation concerning the taking of plaintiff's deposition on February 27, 1965.
2. Plaintiff's Interrogatories to the Defendant, Nos. 1 to 348 and Nos. 373 to 424 inclusive.
3. With respect to the transcript of the hearing of March 11, 1966, pp. 2-26, 41-43.
4. Plaintiff's Notice to Take the Oral Deposition of Juri Raus, mailed March 29, 1966.
5. Letter dated April 4, 1966 from Hon. Roszel C. Thomson, Chief Judge of the United States District Court for the District of Maryland, to counsel.

6. Defendant's Motion for a Protective Order pertaining to the taking of the defendant's oral deposition, mailed April 11, 1966.

7. With respect to the transcript of the hearing of April 14 (mistakenly referred to by appellant as March 11), pp. 17-60, so that the entire transcript is included.

8. Supplemental Memorandum of the defendant in support of Motion for Summary Judgment, mailed April 28, 1966.

9. With respect to the transcript of the hearing of April 28, 1966, of which the appellant has designated pp. 1-90, the appellee would also include p. 91.

10. With respect to the deposition of Thomas W. LaVenia of which the appellant has designated pp. 1-4, appellant would add pp. 5-11.

11. With respect to the transcript of the hearing of May 13, 1966, pp. 7-9.

12. Affidavit of Lawrence R. Houston, General Counsel of the Central Intelligence Agency, and the letter of Hon. Thomas W. Kenney, Esq., United States Attorney for the District of Maryland, dated May 31, 1966 which transmitted the affidavit. Since the text of the affidavit is set forth commencing at p. 27 of the transcript of the proceedings of September 28, 1966, it need not be reproduced. The Joint Appendix may simply refer to the fact that the text is to be found at the further page.

13. Letter dated May 31, 1966 from Hon. Roszel C. Thomsen, Chief Judge of the United States District Court for the District of Maryland, to counsel.

14. Defendant's Reply Memorandum in support of its Motion for Summary Judgment, mailed July 29, 1966.

15. With respect to the transcript of the hearing of September 23, 1966, appellee would include pp. 21-35; 39-63 and 94-100.

16. Letter of Ernest C. Raskauskas, Esq., to Hon. Roszel C. Thomsen, Chief Judge of the United States District Court for the District of Maryland, dated October 5, 1966.

Appellant will pay for the cost of printing the material designated by him in this notice but will expect to have such expenditure taxed as costs in the event he is successful in the present appeal.

[]
[]
Attorneys for Appellee

CERTIFICATE OF SERVICE

A copy of the foregoing Counter-Designation was mailed this 27th day of February, 1966 to Ernest C. Raskauskas, Esq. and Robert J. Stanford, Esq., 1825 K Street, N. W., Suite 707, Washington, D. C., Attorneys for Appellee.

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